

EXHIBIT D

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

JANE DOE 1, et al,

Plaintiffs,

v.

BAYLOR UNIVERSITY,

Defendant.

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Civil Action No. 6:16-CV-00173-RP

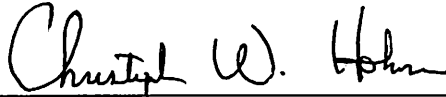
**Consolidated with
6:17-CV-228-RP
6:17-CV-236-RP**

DECLARATION OF CHRISTOPHER W. HOLMES

1. My name is Christopher W. Holmes, and I am the General Counsel of Baylor University (“Baylor” or “university”). I am over 18 years of age, of sound mind, and am fully competent to testify to the matters stated in this declaration based upon my personal knowledge. Data reflected in this declaration is based on data collected and maintained by the university.
2. In the fall of 2004, 13,799 students were enrolled at the university in its graduate and undergraduate programs. In the fall of 2017, 17,059 students were enrolled in the university’s graduate and undergraduate programs.
3. In the fall of 2004, Baylor employed 2,151 full-time and part-time employees. In the fall of 2017, Baylor employed 3,205 full-time and part-time employees.
4. In the fall of 2004, thirty-six individuals served on Baylor’s Board of Regents. In the fall of 2017, forty individuals served on the Baylor’s Board of Regents. Membership on the Board of Regents changed over time. Between 2004 and 2017, a total of eighty-four individuals have served as members of the Board of Regents.
5. Between 2004 and 2017, seven individuals served as president or interim president of the university. During that same time period, forty-one different individuals served on the president’s Executive Council.
6. Between 2004 and 2017, different individuals were appointed or hired to serve in various administrative capacities affecting services for students. For example, in July 2009, Dr. Kevin Jackson began his employment at Baylor as vice president of student life with responsibilities over residence halls, student conduct administration, student health services, among other programs. In September 2011, Tiffany Lowe was hired as the director of Campus Living and Learning to manage residence halls. In July 2014, Baylor’s campus police chief retired, and a new chief was appointed. In September 2014, Mark Childers was hired as Baylor’s associate

vice president over a newly created department of public safety, following a career with the U.S. Secret Service and U.S. Marshalls Service. In the fall of 2011, Baylor designated an administrator to coordinate Baylor's Title IX services. In the 2014-15 school year, Baylor hired its first full-time Title IX Coordinator and two dedicated Title IX investigators.

5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, reading "Christopher W. Holmes". The signature is written in a cursive style with a large initial "C" and a stylized "H".

Christopher W. Holmes

4830-5511-8017